

Remarks

The Office action dated June 23, 2009, has been reviewed and carefully considered. Claims 1-20 have been canceled without prejudice or disclaimer. New claims 21-38 have been added. After entry of these amendments, claims 21-38 are pending in the application. Applicant respectfully requests reconsideration in view of the following comments.

Applicant notes with appreciation Examiner Ko's indication that claims 15-18 contain allowable subject matter. Such allowable subject matter has been included in some new claims. For example, new claims 26-29 contain some subject matter similar to canceled claims 15-18, and thus should also be allowable.

New claim 21 does not contain new matter. Claim 21 is based on a combination of canceled claims 1 and 2, and in addition includes the features of both the horizontal and vertical manifolds being supplied with cleaning fluid from a common supply. Support for new claim 21 can be found, for example, in inlet manifold 37, which supplies both the horizontal and vertical spray manifolds. See page 5, lines 8-12 of the specification.

Claims 22-38 depend from claim 21 and also do not contain new matter. Support for new claim 22, which recites that the vertical spray manifold further comprises reciprocal rotational motion about its longitudinal axis, can be found at, for example, page 7, lines 12-13.

New claim 23 recites an inlet manifold which provides fluid communication between a supply of cleaning fluid and the spray manifolds where the inlet manifold is coupled to the spray manifold drive motor so that reciprocating motion of the inlet manifold causes reciprocating motion of the at least one horizontal spray manifold. Claim 24 recites a drive wheel that is rotated by the spray manifold drive motor and a first cam member connected between the drive wheel and the inlet manifold so that rotation of the drive wheel causes reciprocal motion of the inlet manifold. Support for the features of claims 23 and 24 can be found, for example, at page 6, lines 5-13.

New claims 25-38 recite similar features as recited in the original claims, and thus also do not contain new matter.

In rejecting claims 1-14, 19, and 20, the Office action cites U.S. Patent No. 5,427,128 (Minkin). While Applicant respectfully disagrees with the reasoning set forth in the Office action, claims 1-20 have been canceled, and new claims 21-38 have been added to put the present application in condition for allowance.

Independent claim 21 recites a parts washer having a plurality of spray manifolds, where "each spray manifold [has] a plurality of jets arranged to spray cleaning fluid from a common cleaning fluid supply onto the parts in the receptacle." The parts washer of claim 21 also recites "a spray manifold drive motor which causes reciprocating motion of the spray manifolds, the spray manifolds comprising at least one horizontal spray manifold arranged to undergo reciprocal movement in a generally horizontal plane and to spray cleaning fluid in a generally vertical direction and a vertical spray manifold arranged to undergo reciprocal linear motion generally along a longitudinal axis of the spray manifold."

Minkin does not disclose or suggest a plurality of spray manifolds, where each spray manifold has a plurality of jets arranged to spray cleaning fluid from a common cleaning fluid supply. On the contrary, Minkin's wash manifold 32 sprays cleaning fluid 20 *from a fluid holding space 18*, while rinse manifold 42 sprays rinsing water "from a fresh water source so that operation of the rinse system *adds fluid to the fluid holding space 18.*" Minkin col. 4, lines 29-45; col. 5, lines 22-35 (emphasis added). Thus, the spray manifolds 32, 42 disclosed in Minkin do not spray from a common cleaning fluid supply. One of ordinary skill in the art would not modify the washer disclosed in Minkin so that spray manifolds 32, 42 spray from a common supply, because it would go against Minkin's teaching of using spray manifold 32 to spray cleaning fluid, and rinse manifold 42 to spray rinsing water, without cleaning fluid present. If spray manifolds 32, 42 were to spray from a common fluid supply, neither would perform the rinsing function taught by Minkin. Thus, Minkin does not disclose, or even suggest, this feature of the present claim 21.

Minkin also does not teach or suggest a drive motor which causes reciprocating motion of both a horizontal spray manifold in a generally horizontal plane and a vertical spray manifold along a generally longitudinal axis. On pages 3-4, the Office action contends that Minkin "appears" to teach a spray manifold assembly arranged to undergo reciprocal movement in a horizontal plane, and further contends that it would have been obvious "to provide a spray manifold (the vertical spray manifold 42, Figs. 2-3) which could undergo reciprocal vertical motion in conjunction with a drive unit." The Office action thus suggests that it would have been obvious to modify the parts washer of Minkin to include an additional drive shaft to drive the rinse manifold in a reciprocal vertical motion. Even if this were correct, the modification still does not suggest the parts washer of claim 21, because claim 21 recites a drive motor that causes both reciprocal motion of the horizontal spray manifold in a generally horizontal plane, and

reciprocal motion of the vertical spray manifold generally along its longitudinal axis. One of ordinary skill in the art would not be motivated to use a drive motor to operate both the wash manifold 32 and the rinse manifold 42 of Minkin, because the different spray manifolds are designed for different purposes, and thus operate *at different times*. The wash manifold 32 operates during a wash cycle, and rinse manifold 42 operates during a rinse cycle once the wash cycle is complete. See Minkin col. 5, lines 22-24. Thus, one of ordinary skill in the art would not modify Minkin to drive both the wash manifold 32 and the rinse manifold 42 with the same drive motor because Minkin's parts washer would not operate correctly if both the wash manifold and the rinse manifold were operated at the same time. For at least this additional reason, Minkin does not teach or suggest all the features of claim 21.

Each of new claims 22-38 recites a patentably distinct combination of features and depends from claim 21, and thus each is not taught or suggested by Minkin for at least the same reasons that claim 21 is not taught or suggested by Minkin.

For example, new claim 22 depends from claim 21 and recites that the reciprocal motion of the vertical spray manifold further comprises reciprocal rotational motion about its longitudinal axis. Thus, the vertical spray manifold of claim 22 both reciprocates linearly along its longitudinal axis and rotates about its longitudinal axis. Minkin does not disclose or suggest a vertical spray manifold arranged to provide such motion.

For at least these reasons, Applicant submits that claims 21-38 are allowable over Minkin, and thus requests all claims be allowed. Should any questions remain regarding this application, Examiner Ko is invited to contact the undersigned attorney at the telephone number below.

Respectfully submitted,

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